**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
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APR 28 2011

Ref: 8EPR-N

Thomas Malecek, District Ranger
Divide Ranger District
Rio Grande National Forest
13308 West Highway 160
Del Norte, CO 81132

RE: EPA Comments on Final Environmental Impact Statement, Big Moose Vegetation Management Project, CEQ # 20110101

Dear Mr. Malecek:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the March 2011 Final Environmental Impact Statement (FEIS) for the Big Moose Vegetation Management Project. This FEIS was prepared by the Divide Ranger District of the U.S. Department of Agriculture Forest Service (USFS) Rio Grande National Forest to analyze the potential environmental impacts associated with managing timber stands affected by spruce beetle and the potential impacts of aspen regeneration efforts using various treatment methods, including prescribed burning. The Big Moose Vegetation Management Project area covers 22,152 acres and lies approximately 15 miles southwest of the town of Creede, in Hinsdale and Mineral Counties, Colorado.

EPA provided scoping comments on the proposed project in an April 3, 2009 letter, and we provided additional comments on the Draft Environmental Impact Statement (DEIS) with an October 27, 2010, letter. As described in the DEIS, the main focus of the project is to harvest and regenerate timber stands killed by, or infested with, spruce beetle and to promote aspen regeneration and health through a mix of timber harvest, reforestation and prescribed fire treatments. Four alternatives were analyzed, including Alternative 1 (No Action), Alternative 2 (Limited Action), Alternative 3 (Proposed Action) and Alternative 4 (Preferred Action). Alternative 4 would apply the same treatments as Alternatives 2 and 3, but on more acreage (up to 4,430 acres sanitation/salvage harvesting and 760 acres clearcut harvesting) to yield up to 65 million board feet of timber products. Alternative 4 also would include the addition of pre-commercial thinning and more miles of temporary road construction. After harvest, reforestation would occur on approximately 1,000-2,500 acres. Prescribed fire treatment would occur on up to

6,000 acres (in some areas used in conjunction with timber harvest). EPA's primary concerns with the August 2010 DEIS were related to air quality, aquatic resources, and threatened and endangered species.

To address comments received on the DEIS, the FEIS includes the following: a new Air Quality section (Section 3.19); improved project design criteria, Best Management Practices (BMPs), and monitoring requirements; a new Appendix F (Global Climate Change); and supplemental information in Chapter 6, Response to Public Comments to the DEIS. The USFS also has issued a Record of Decision (ROD) for the project. Specifically, the USFS has decided to implement Alternative 4, with modifications to replace the prescribed burning component of Alternative 4 with the prescribed burning component of Alternative 2. Prescribed burning would be applied on 1,471 acres only in areas where aspen is a major component of the stand or areas within the Wildland Urban Interface (WUI). This modification was based on meeting the intent of the Southern Rockies Lynx Amendment (SRLA) and best addresses diversity of lynx habitat issues.

Based on our review of the FEIS and the alternative selection as discussed in the ROD, EPA believes that its primary concerns with the DEIS have been addressed. The FEIS supports the decision to implement Alternative 4, with modifications.

**Air Quality**

EPA is pleased that the FEIS includes a new Section 3.19, Air Quality. This section provides baseline data for existing air quality near the project area, as well as a discussion of direct, indirect and cumulative air quality impacts associated with project activities. The FEIS also contains additional background information and/or requirements related to fire and smoke management, including: (1) close coordination with the Colorado Air Pollution Control Division for air quality permitting requirements related to prescribed burning operations; (2) incorporation of the Interagency Prescribed Fire Planning and Implementation Procedures Guide into any Burn Plans designed specifically for this project; and (3) improved design criteria for public notification of prescribed burns. While this process should result in the use of appropriate smoke mitigation, modeling, and monitoring techniques, EPA would welcome the opportunity to discuss the air quality analyses of any site-specific Burn Plans for this, and future, projects to ensure adequate protection of the National Ambient Air Quality Standards and nearby Class I and Sensitive Class II area visibility. However, because the potential prescribed burn acreage has been significantly reduced from approximately 6,000 acres to approximately 1,470 acres, any related air quality and visibility impacts associated with this project should be significantly reduced.

**Aquatic Resources**

We appreciate the addition of water influence zone maps to Appendix B. These maps provide a good visual for baseline wetlands information. Since you note that water quality monitoring data are limited, we recommend that project- and/or forest-level monitoring plans include efforts to develop these data in the future.

New temporary roads will be constructed in a manner consistent with the management measures and design criteria of the Watershed Conservation Practices Handbook. Revegetation and prescribed burn soil impacts will be monitored as part of the project design criteria and Forest Plan annual monitoring requirements. We note that BMPs were expanded to include the potential use of bioengineering and soft bank stabilization methods at stream crossings. The response to comments section, Chapter 6, provides supplemental information related to the impacts of extensive beetle infestation on watershed hydrology. It also notes that design criteria and BMPs for timber harvest should be protective and no public water supply intakes are downstream from the project area. In general, it appears that project design criteria, BMPs and monitoring requirements should minimize impacts to aquatic resources.

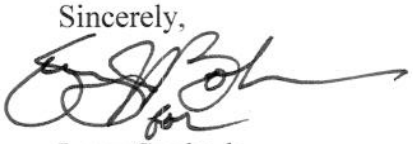
**Threatened and Endangered Species**

The original prescribed burning component of Alternative 4 provided for prescribed burning on up to 6,000 acres and included treatment areas outside of the WUI which contain dense horizontal cover and in which aspen is a minor component of the stand (*i.e.*, potential Canada lynx habitat). The USFS concluded that the original prescribed burning component of Alternative 4 was not consistent with the SRLA and was likely to adversely affect lynx and lynx habitat.

Since the USFS has decided to select a modified Alternative 4, which replaces the prescribed burning component with the more protective component of Alternative 2, EPA's concerns related to potential prescribed fire impacts to Canada lynx are alleviated. The modification to the prescribed burning component reduces treatment application to 1,471 acres and limits such treatments to areas where aspen is a major component of the stand or that are within the WUI. The ROD notes that the U.S. Fish and Wildlife Service concurs that Alternative 4, as modified, "may affect but is not likely to adversely affect" Canada lynx.

We appreciated your willingness to share draft revisions between the DEIS and FEIS phases of this project. We also appreciate the opportunity now to review and comment on this completed FEIS/ROD. If we may provide further explanation of our comments, please contact me at 303-312-6004, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Larry Svoboda
Director, NEPA Compliance and Review Program
Ecosystems Protection and Remediation